

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

GUANGEN LI,

Plaintiff,

V.

**MOUNTAIN RUN SOLUTIONS, LLC
F/K/A PERFECTION COLLECTION and
EQUIFAX INFORMATION SERVICES,
LLC,**

Defendants.

[illegible]

Case No. 3:23-cv-00355

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Equifax Information Services LLC (“Equifax”) respectfully requests that this Court enter an order extending the time to answer or otherwise respond to Plaintiff’s Complaint to December 26, 2023. In support of this motion, Equifax states as follows:

1. Plaintiff filed Complaint with this Court on October 26, 2023.
2. Equifax was served with the Complaint on November 3, 2023.
3. Absent an extension, Equifax's deadline to answer or otherwise respond to the Complaint is currently November 24, 2023.
4. This request is not made for the purpose of delay or harassment, and no party will be prejudiced by the additional time for Equifax to answer or otherwise respond.
5. Equifax is still reviewing the allegations and conducting an investigation into the allegations in order to prepare its answer. Accordingly, Equifax respectfully requests an extension through and including December 26, 2023 within which to file its answer or other responsive pleading in this matter.

6. On November 16, 2023, counsel for Equifax requested, and counsel for Plaintiff agreed, that Equifax may have up to and including December 26, 2023 to file its Answer or otherwise respond to Plaintiff's Complaint, subject to the Court's approval.

7. This is Equifax's first request for an extension of time to answer or otherwise respond to the Complaint.

WHEREFORE, Equifax respectfully requests that the Court extend the time for it to answer or otherwise respond to Plaintiff's Complaint until December 26, 2023.

Dated: November 22, 2023

Respectfully submitted,

By: /s/ Forrest M. "Teo" Seger III

FORREST M. "TEO" SEGER

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**ATTORNEY FOR DEFENDANT,
EQUIFAX INFORMATION SERVICES LLC**

CERTIFICATE OF CONFERENCE

I hereby certify that Equifax's counsel conferred with Plaintiff's counsel via e-mail on November 16, 2023 regarding the relief requested and he is unopposed to the request.

/s/ Forrest M. "Teo" Seger III

Forrest M. "Teo" Seger III

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2023, a true and correct copy of the foregoing *Defendant Equifax Information Services LLC's Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint* was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Forrest M. "Teo" Seger III

Forrest M. "Teo" Seger III